



**RAYTOWN
QUALITY
SCHOOLS**
Expect the Exceptional

6608 Raytown Road • Raytown, MO 64133-5265 • Phone: 816-268-7008 • Fax: 816-268-7019

Office of the Superintendent
allan.markley@raytownschools.org

September 10, 2013

Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Sir/Madame,

I am writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes changes to the E-Rate program. Before delving into my response to the proposed changes, I want to first thank the FCC for your continued support for the E-Rate program. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

Raytown Quality Schools is a first tier suburban district whose boundaries touch the urban Kansas City inner core. Raytown educates over 8,500 students with 66% of our student population qualifying for free or reduced lunch. Over the past four (4) years, Raytown has received over \$1,175,000 in E-Rate funding. This year alone, Raytown expects to receive \$383,000 for priority 1 services. This funding has allowed the district to provide high speed internet connectivity to our students in addition to essential communication service that ensures student safety. The district depends on our E-Rate funding to provide these critical services. Without this funding, we would have no choice but to reduce the level of internet connectivity provided to students and diverts instructional funds away from the classroom.

The E-Rate program is a program succeeding in its mission. As the FCC moves forward with this NPRM, it is prudent to remain focused on the fact that E-Rate is a program that works, and that any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential. The current program, while needing some marginal updates to its structure, is most strained by increasing demand for E-Rate-supported services and persistently low funding. The single most effective step the FCC can take to bolster E-Rate's current and future success is to provide \$5 billion in funding, an amount commensurate with current demand.

There are additional programmatic changes and restructuring that can provide additional efficiencies and savings. To rely solely on programmatic efficiencies, however, without providing additional new funding is a shortsighted solution, a policy that fails to address the program's most significant problem: inadequate funding.

I think this NPRM is an opportunity to tackle the important work of expanding a successful program. E-Rate is not a broken program that needs to be fixed; it is a successful program that schools and libraries continue to rely on, a program that must continue to provide funding critical for telecommunications and connectivity.

E-Rate enables Raytown, and districts across the nation, to incorporate digital learning throughout our curriculum. This connectivity is becoming increasingly important as we move to the Common Core Standards and prepare our students for life in a digital society. E-Rate has single-handedly helped to connect almost all of our nation's schools and libraries to the internet; however, as we move towards a flexible learning environment and meeting the need for anytime/anywhere learning, schools are faced with ensuring connectivity for our students outside of our physical walls. E-Rate must now shift its focus to expanding connectivity into rural and poverty stricken communities. This new goal can only be accomplished through increased funding.

In years past, funds were available to allow for priority 2 requests. Recently, however, E-Rate has been oversubscribed and underfunded. Over the past four (4) years, Raytown requested and was denied over \$880,000 in priority 2 funding that most likely would have been granted prior to the 2009 fiscal year. Increased program funds will allow districts to invest in the infrastructure necessary to bridge the need for community access. If this access is not funded at the school level, additional considerations must be provided to meet this critical digital learning need.

In addition to increased funding, the application process must be streamlined. The E-Rate regulations, eligibility lists and funding forms create a challenging process. The complexity of the requirements forces districts to either pay a consultant or spend a considerable amount of human resources to complete the application and reimbursement forms. Streamlining the application process and eligibility list will allow districts to focus their resources on implementing the tools funded through E-Rate.

Thank you for considering my response as you move forward with your decision on the E-Rate program. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program. I urge you to support significant increased funding for the E-Rate program, and to ensure that the program and its limited resources are protected and preserved.

Respectfully,

A handwritten signature in black ink, appearing to read 'A. Markley', with a long horizontal flourish extending to the right.

Dr. Allan Markley
Superintendent of Schools